

REMARKS/ARGUMENTS

Claims 1-4, 6, 7, 9-13, 15, 16, 18, 20, 21, 23-29, 31, 32 and 37-40 are pending in this application. By this Amendment, claims 38-40 are added. Support for the claims can be found throughout the specification, including the original claims and the drawings.

The Examiner is thanked for the courtesies extended to Applicant's representative during the personal interview conducted July 10, 2007. The substance of the interview, including any agreements reached, is reflected in the above amendments and the following remarks. Withdrawal of the rejections is thus respectfully requested.

I. Rejections Under 35 U.S.C. §103(a)

The Office Action rejects claims 10-13, 15, 16, 18, 21, 23-29, 31, 32 and 36 under 35 U.S.C. §103(a) over U.S. Patent No. 5,925,273 to Sherrill. Claim 36 is canceled. The rejection, in so far as it applies to the remaining claims, is respectfully traversed.

Independent claim 10 is directed to a heater assembly for a dryer, comprising, *inter alia*, independent first and second coil arrays provided in the air passage and configured to alternately cross the plate between the upper and lower passages, wherein the first coil array comprises a plurality of first coils alternately positioned in the upper and lower passages, and the second coil array comprises a plurality of second coils alternately positioned in the upper and lower passages such that the first and second coils positioned in the upper passage form an alternating pattern in the upper passage, and the first and second coils positioned in the lower passage form an alternating pattern in the lower passage, wherein each of the plurality of first coils is positioned

substantially directly across from a corresponding second coil of the plurality of second coils on the opposite side of the plate.

Independent claim 24 recites similar features in varying scope. As discussed during the personal interview, Sherrill neither discloses nor suggests the features of independent claims 10 and 24, or the respective claimed combinations of features.

Sherrill discloses a multistage heater assembly in which incoming air designated by the arrow A flows first across a first heater element 10a (which may be compared to the recited first coil array), and then across a second heater element 10b (which may be compared to the recited second coil array). The heater elements 10a and 10b are mounted on a plate 14 within a housing. As shown in the side view of the heater assembly in Figure 2 of Sherrill, the first heater element 10a includes six coils (which may be compared to the recited plurality of first coils), with three coils positioned adjacent one another above the plate 14, and three coils positioned adjacent one another below the plate 14 so as to form two parallel rows of first coils which face each other from opposite sides of the plate. Likewise, the second heater element 10b includes six coils (which may be compared to the recited plurality of second coils), with three adjacent coils positioned above the plate 14 facing three adjacent coils positioned below the plate 14.

The first and second heater elements 10a and 10b are clearly positioned sequentially along an airflow direction within the housing, and the individual coils of the respective first and second heater elements 10a and 10b in no way form an alternating pattern, and there is no interspersion

Reply to Office Action of April 11, 2007

or intermixing between the coils of the first and second heater elements 10a and 10b, either above or below the plate 14.

Sherrill neither discloses or suggests that the coils of the first and second elements 10a and 10b form an alternating pattern, either above or below the plate 14, as do the plurality of first and second coils recited in independent claim 10, nor that the coils of the first element 10a are positioned directly across the plate from the coils of the second element 10b, as do the plurality of first and second coils recited in independent claim 10.

Further, Sherrill neither discloses nor suggests that an upper coil from the first heater element 10a is positioned between two upper coils from the second heater element 10b, nor that an upper coil from the second heater element 10b is positioned between two upper coils from the first heater element 10a, as are the upper first and second coils recited in independent claims 10 and 24. Likewise, Sherrill neither discloses nor suggests that a lower coil from the first heater element 10a is positioned between two lower coils from the second heater element 10b, nor that a lower coil from the second heater element 10b is positioned between two lower coils from the first heater element 10a, as are the lower first and second coils recited in independent claims 10 and 24. Thus, Sherrill necessarily neither discloses nor suggests that the upper coils of the first and second heater elements 10a and 10b form an alternating pattern above the plate 14, and the lower coils of the first and second heater elements 10a and 10b form an alternating pattern below the plate 14, as do the upper and lower first and second coils recited in independent claims 10 and 24.

Further, it would not have been obvious to modify this sequential arrangement of the coils of the first and second heater elements 10a and 10b as disclosed by Sherrill. Such a rearrangement of the coils to in any way alternate, intermingle, or overlap the coils of the first and second heater elements 10a and 10b would require a complete redesign of the plate 14, mounting structure, crossover portions 22a and 22b, and terminal connections 28 to retain independent control of the heater elements 10a and 10b. Such a modification would significantly affect the structural, mechanical, and electrical integrity of Sherrill's design, while adding complexity and cost.

Accordingly, it is respectfully submitted that independent claims 10 and 24 are not anticipated by Sherrill, and thus the rejection of independent claims 10 and 24 under 35 U.S.C. §103(a) over Sherrill should be withdrawn. Dependent claims 11-13, 15, 16, 18, 21, 23-29, 31 and 32 are allowable at least for the reasons set forth above with respect to independent claim 24, from which they depend, as well as for their added features.

The Office Action rejects claims 1-4, 6, 7, 9, 20 and 37 under 35 U.S.C. §103(a) over U.S. Patent No. 4,700,495 to Drews et al. (hereinafter "Drews") in view of Sherrill. The rejection is respectfully traversed.

Independent claim 1 is directed to a dryer which includes a heater assembly. Independent claim 1 recites that the heater assembly includes, *inter alia*, independent first and second coil arrays provided in the air passage and each configured to cross the plate between the upper and lower passages, wherein the first coil array comprises a plurality of first coils alternately

positioned in the upper and lower passages, and the second coil array comprises a plurality of second coils alternately positioned in the upper and lower passages such that the first and second coils positioned in the upper passage form an alternating pattern in the upper passage, and the first and second coils positioned in the lower passage form an alternating pattern in the lower passage, wherein each of the plurality of first coils is positioned substantially directly across from a corresponding second coil of the plurality of second coils on the opposite side of the plate. Independent claim 37 recites similar features in varying scope.

As discussed during the personal interview and as acknowledged by the Examiner in the remarks regarding independent claims 1 and 37, Drews neither discloses nor suggests such features. Further, as discussed during the personal interview and as set forth above, Sherrill neither discloses nor suggests that the coils of the first and second heater elements 10a and 10b may be in any way intermingled, mixed or alternated, nor that coils of the first element 10a are positioned directly across the plate from coils of the second element 10b. Thus, Sherrill fails to overcome the deficiencies of Drews.

Accordingly, it is respectfully submitted that independent claims 1 and 37 are allowable over the applied combination, and thus the rejection of independent claims 1 and 37 under 35 U.S.C. §103(a) over Drews and Sherrill should be withdrawn. Dependent claims 2-4, 6, 7, 9 and 20 are allowable over Drews and Sherrill at least for the reasons set forth above with respect to independent claim 1, from which they depend, as well as for their added features.

II. New Claims 38-40

New claims 38-40 are added to the application. It is respectfully submitted that new claims 38-40 meet the requirements of 35 U.S.C. §112, and are allowable at least for the reasons set forth above with respect to independent claims 1, 10 and 37, from which they respectively depend, as well as for their added features.

III. Conclusion

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned Joanna K. Mason, at the telephone number listed below.

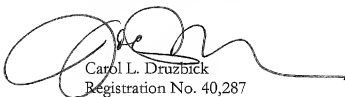
Serial No. 10/721,179

Docket No. K-0586

Reply to Office Action of April 11, 2007

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
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Date: August 6, 2007

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